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**ATTORNEYS FOR CHAPTER 11 DEBTOR**

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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

**In the Matter of:** : **CASE NO. 21-13085-ABA**

**Choates G. Contracting, LLC** :

**Debtor** : **ADV. NO.**

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**Choates G. Contracting, LLC** :

**Plaintiff,** :

**vs.**

**Philly Properties GP, LLC** :

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**Defendants** :

**UPDATED CERTIFICATION IN SUPPORT OF APPLICATION TO EMPLOY**

The following additional information is disclosed by McDowell Law, PC to the Court:

McDowell Law, PC represents the Debtor, Choates G. Contracting, LLC. The principal of the debtor is Darrell Choates.

Mr. Choates previously filed a chapter 11 case for another company, Choates General Contracting, Inc. (Case No. 18-26699-JNP). That case was converted to Chapter 7 and Barry R. Sharer was appointed as the Chapter 7 Trustee. Mr. Sharer employed the Law Offices of Joseph A. McCormick, Jr. P.A. (Joseph McCormick, Esq., Paul S. Pflumm, Esq.) to represent him as Trustee.

The Law Offices of Joseph A. McCormick, Jr., P.A. ceased operations on or about August 30, 2021 and both attorneys joined the law firm of McDowell Law, PC. They continue to represent Barry R. Sharer.

As part of an internal review of files and discussions, this relationship was recently discovered.

Mr. McCormick submitted an updated retention application in the Choates General Contracting, Inc. Case and in support thereof, certified as follows:

“Choates G. Contracting, LLC was created shortly after the filing of the instant case [i.e. Choates General Contracting, Inc.]. The Chapter 7 Trustee in the instant case previously reviewed the factual circumstances and determined that there was no reason to pursue Choates G. Contracting, LLC with respect to instant case. Further, the Trustee is not contemplating bringing a cause of action against Darrell Choates.”

“The attorneys involved with the Choates G. Contracting, LLC bankruptcy case will be restricted from access to the case file in the instant case and the attorneys involved with this case will be restricted from access to the Choates G. Contracting, LLC file.

As the Chapter 7 Trustee has already determined that they will not pursue any cause of action against the Debtor or the Debtor’s principle, there is no actual conflict of interest that arises – only the potential appearance of an conflict. Mr. Choates has been advised of this potential conflict and issues regarding the onboarding of Mr. McCormick and Mr. Pflumm and has consented to the continued representation of the Debtor by McDowell Law, PC.

The above statements are true and correct to the best of my knowledge, information, and ability.

BY: /s/ Daniel L. Reinganum

Daniel L. Reinganum

Date: October 5, 2021